

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
OXFORD DIVISION

RONALDO DESIGNER JEWELRY, INC.

PLAINTIFF

v.

CIVIL ACTION NO. 3:15-CV-076-MPM-JMV

AMBER WILLIS
d/b/a KAYDILY WRAP DESIGNS
f/k/a AMBER'S CRAFTS, and
JOHN DOES Numbers 1 through 99

DEFENDANTS

AGREED PERMANENT INJUNCTION

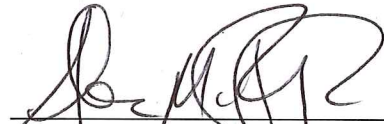
Pursuant to the agreement of the parties, in accordance with Fed.R.Civ.P 65, and this Court being otherwise sufficiently advised, it is hereby ordered and adjudged that the Defendant, Amber Willis d/b/a Kadily Wrap Designs f/k/a Amber's Crafts, and all those in active concert and privity with her, is hereby permanently enjoined from making defamatory remarks or comments about Plaintiff, or copying, manufacturing, reproducing, importing, publishing, displaying, distributing, transmitting, selling, or otherwise placing on the market the Plaintiff's Works as shown in Exhibit 3, the Alleged Infringing Works shown in Exhibit 2 or Plaintiff's trade dress as defined in Exhibit 1.

The Defendant agrees to be bound by the Agreed Permanent Injunction herein and subject to contempt of court if the Defendant violates this injunction. Defendant further agrees that should she violate this injunction, Defendant will submit to personal jurisdiction of the United States District Court for the Northern District of Mississippi, Oxford Division. In the event Plaintiff takes legal action to enforce the terms of this Agreed Permanent Injunction and the Defendant is determined to be in violation of this Agreed Permanent Injunction, Defendant agrees to pay the reasonable attorneys' fees and other costs and expenses incurred by Plaintiff to enforce this Agreed Permanent Injunction.

This the 10th day of February, 2016.

/s/ MICHAEL P. MILLS
UNITED STATES DISTRICT COURT JUDGE

HAVE SEEN AND AGREE:



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AMBER WILLIS
d/b/a KAYDILY WRAP DESIGNS
f/k/a AMBER'S CRAFTS
764 Curtis Locke Station Road
Batesville, Mississippi 38606-6617
Defendant

EXHIBIT 1
PLAINTIFF'S TRADE DRESS DEFINED

The design features which comprise the trade dress of Plaintiff's jewelry works include a combination of square, diamond and round cut 18-20 gauge artist's wire and sterling silver wire, which when used in a twisted form has approximately 8-10 twists per inch and use 18 gauge half round wrap to form the hook clasps. The clasps have a distinctive, signature shape of a house, having at least six equal horizontal wraps and then wraps that taper to a point, like the roof of a house, to meet the hook and eye sides of the closure. Bracelets that feature gemstones or pearls incorporate stones and pearls that are 5-6 millimeters in size, and are set in the bracelet using a distinctive "window" frame for each stone or pearl; four wire wraps flank the windows with two wraps in between each pearl or stone. Bracelets which incorporate flat stones or bugle bead stones use stones that are 4 by 13 millimeters. Pattern bar bracelets feature a flat pattern bordered by a square and twisted signature gold and/or silver wire wrap, with five sets of wraps, each three wraps around. By using gold and silver wire and stones and/or pearls of similar dimensions and consistent number of wraps to frame jewels and embellish pattern bars, all Ronaldo bracelets share a recognizable look that identifies their source.

EXHIBIT 2
ALLEGED INFRINGING WORKS

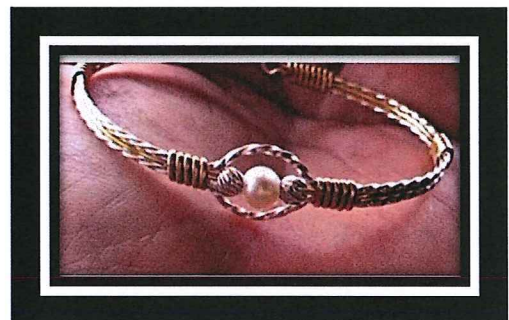
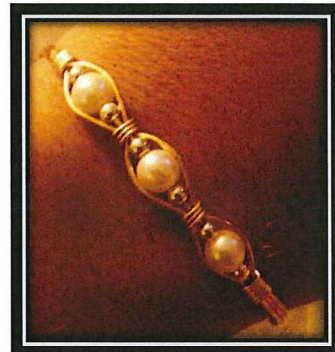




PHOTO NOT AVAILABLE

**Willis version of
The Power of Prayer Bracelet**

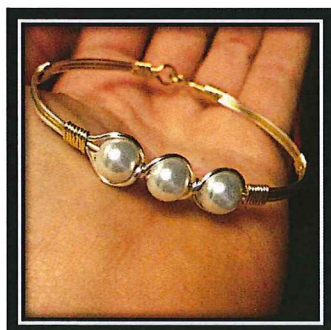
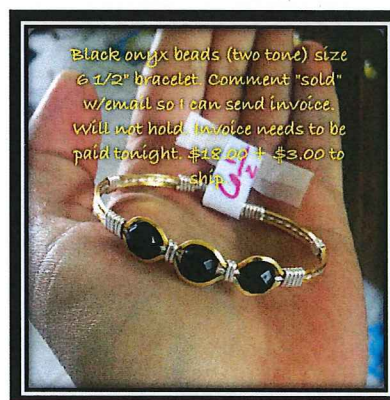


EXHIBIT 3
PLAINTIFF'S WORKS

The Power of Prayer Bracelet®



Waverly Bracelet



The Bella Bracelet



The Touch Bracelet



Eclipse Bracelet



Grandma Waverly Bracelet



Bedazzling Bracelet



Purely Positive Bracelet



Spring Time Bracelet



The Mina Bracelet



The Wildfire Bracelet

